

UNITED STATES DISTRICT COURT  
for the  
Southern District of Ohio

United States of America

v.

Richard James Rodgers  
(a.k.a. Country/Kountry/Kuntry)

) Case No.

2:20-mj-609

*Defendant(s)*

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 02/11/2019 - 11/21/2019 in the county of Franklin in the  
Southern District of Ohio, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 USC Section 846	Conspiracy to possess with the intent to distribute 400 grams or more of a mixture or substance containing fentanyl.

This criminal complaint is based on these facts:

See Attached Affidavit

Continued on the attached sheet.

  
Complainant's signature

Ryan Marvich, Special Agent HSI

Printed name and title

  
Elizabeth Preston-Deavers, U.S. Magistrate Judge  
Judge's signature  
Elizabeth Preston-Deavers, U.S. Magistrate Judge  
Printed name and title

Sworn to before me and signed in my presence.

Date: 9/3/2020

City and state: Columbus, Ohio

## AFFIDAVIT

I, Ryan Marvich, being duly sworn, state:

### INTRODUCTION

1. Your Affiant is a sworn Special Agent with the United States Department of Homeland Security (DHS), U.S. Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI). Your Affiant has been a Special Agent within DHS since the Department's creation in May 2003. Your Affiant has been assigned to the HSI Columbus office since February 2008, where your Affiant has been involved with narcotics investigations. Prior to becoming a Special Agent with HSI, your Affiant served as an Officer with the United States Secret Service, Uniformed Division beginning in January 1998. In June 1999, your Affiant accepted a position as a Special Agent with the United States Secret Service. In May 2003, your Affiant transferred employment to become a Special Agent with the United States Customs Service (USCS). In 2003, under the creation of the Department of Homeland Security, various components, including criminal investigators/special agents, with the USCS were merged with components, including criminal investigators/special agents, from the United States Immigration and Naturalization Service (INS) and formed U.S. Immigration and Customs Enforcement (ICE). Since then, criminal investigators/special agents and all related investigative functions of ICE have been moved into Homeland Security Investigations (HSI) within ICE.
2. Your Affiant has participated in and conducted numerous investigations of violations of various state and federal criminal laws, including the unlawful possession with intent to

distribute controlled substances in violation of Title 21, United States Code. These investigations have resulted in arrests of individuals who have possessed with the intent to distribute marijuana, cocaine, heroin, methamphetamines and fentanyl as well as other controlled substances. These various investigations have also resulted in seizures of illegal drugs and proceeds from the distribution of those illegal drugs.

3. Your Affiant is familiar with the operation of illegal drug trafficking organizations in central Ohio.

#### **PURPOSE OF AFFIDAVIT**

4. I am participating in an investigation concerning an organized group of individuals, including Richard James Rodgers (a.k.a. Country/Kountry/Kuntry) and other known and unknown individuals who are suspected of conspiracy to possess with intent to distribute controlled substances, in violation of 21 U.S.C. §§ 841 and 846.
5. The information set forth in this affidavit is based upon my knowledge, training, experience, and participation in investigations involving the smuggling, possession, distribution, and storage of narcotics and narcotics proceeds. This information is also based on the knowledge, training, experience, and investigations conducted by fellow law enforcement officers, who have reported to me either directly or indirectly. I believe this information to be true and reliable. I know it is a violation of 21 U.S.C. § 846 for any person to conspire to possess with the intent to distribute a controlled substance.
6. The information contained in this affidavit is based upon my personal participation in this investigation, that of other agents and detectives assisting in this investigation, and my review of records, documents, and other information relating to this investigation.

7. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint and an arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that Richard James Rodgers (a.k.a. Country/Kountry/Kuntry) has violated 21 U.S.C. §§ 841 and 846.

#### **FACTS ESTABLISHING PROBABLE CAUSE**

8. On February 12, 2019, investigators with Homeland Security Investigations (HSI) and the Franklin County Sheriff's Office (FCSO) encountered Ruben Rodriguez Jr. who was found to be in possession of two kilograms of cocaine. Investigators originally located Ruben Rodriguez Jr. on February 11, 2019 while they were conducting routine surveillance at a Red Roof Inn located at 4530 West Broad Street, Columbus. At that time, investigators observed a silver Ford Fusion bearing Texas license plate KZB9897 parked in the Red Roof Inn parking lot. Upon running this license plate in law enforcement databases, investigators learned that this vehicle was registered to a Michael Rene Ponce in Buda, Texas. Investigators also learned that Ponce was arrested in March 2008 in Austin, Texas as part of a large heroin conspiracy case involving over a dozen other co-conspirators. Ponce was subsequently convicted for violation of Title 21 USC Section 846 (conspiracy to possess with the intent to distribute heroin) and was sentenced to 57 months in federal prison. The law enforcement databases also showed no connections to Ponce and any individuals in Ohio.

9. Investigators began surveillance on the Ford Fusion on February 11, 2019. Investigators observed that the car was driven by a male, later identified as Ruben Rodriguez Jr., and a

female companion, later identified as Beslin Peraza, carried out various activities during the day. The two ate lunch at a Bob Evans Restaurant located at 4331 West Broad Street, Columbus, Ohio. They shopped at a Walmart near Hilliard Rome Road in Columbus. They then went to see a movie at the AMC Starplex Columbus 10 located at 5275 Westpointe Plaza Drive, Columbus, Ohio. Given the background of Rodriguez, and the history of the car, investigators suspected that the two individuals were making attempts to "kill time" which can be indicative as to drug activity, specifically awaiting delivery of possible drug proceeds. While Rodriguez and Peraza were inside the Walmart, FCSO Deputy Rob McKee ran his canine "Gator" around the silver Ford Fusion while it was parked in the Walmart parking lot. Gator gave a positive alert to the presence of narcotics inside the silver Ford Fusion. Eventually, Rodriguez and Peraza checked into a different hotel, the La Quinta Inn and Suites located on 5510 Trabue Road, Columbus, Ohio.

10. On February 12, 2019, investigators re-established surveillance on Rodriguez and Peraza as they traveled to 121 Stevens Avenue, Columbus, Ohio. Upon arriving, Rodriguez was observed entering this residence where he remained for approximately ten minutes. Following his departure from this residence, a deputy with FCSO conducted an investigative traffic stop on the vehicle Rodriguez was driving. During this traffic stop, a Franklin County canine gave a positive alert to the presence of narcotic inside the vehicle. During a subsequent search of the vehicle, approximately 2.0 kilograms of cocaine and \$30,006.00 in U.S. currency were discovered. In a subsequent post-Miranda interview, Rodriguez stated that he was in Columbus for the purpose of overseeing the arrival of cocaine and heroin that was being sent to individuals at 121 Stevens Avenue, Columbus, Ohio. He admitted that the cocaine in his car had been sent to these

individuals at 121 Stevens Avenue approximately 1-2 weeks ago, and he came to Columbus at that time to make sure these individuals received this cocaine. After they received this cocaine he went back to Texas. A short time later he learned that these individuals were not happy with the quality of the cocaine, so he was sent back up to Columbus. When he arrived this time in Columbus, around February 9, 2019, he was directed by his boss in Mexico to retrieve the cocaine that was already delivered and to oversee the arrival of approximately 2 kilograms of heroin that was arriving via UPS. According to Rodriguez, when he was inside the residence located at 121 Stevens Avenue, Columbus, Ohio, he stated that he saw the 2 kilograms of heroin that was sent. It was at this time the individuals at this residence paid him a partial payment of approximately \$30,000 for this heroin. This was the money seized by investigators during the traffic stop on his vehicle. Ruben Rodriguez Jr. was arrested on federal drug conspiracy charges, specifically conspiracy to distribute heroin, at that time. He has subsequently been convicted of this charge in the Southern District of Ohio. Additionally, investigators have learned that an individual named Lashawn White rented 121 Stevens Avenue on August 30, 2017 and was still renting this residence through January 2020.

11. Subsequently, investigators have learned that Lashawn White was arrested by the Ohio Highway Patrol (OHP) on April 1, 2018 after a traffic stop on Livingston Avenue in Columbus, Ohio. During this traffic stop, troopers found a small amount of cocaine in the vehicle and White had a loaded handgun under his thigh while seated in the driver's seat. According to the arresting OHP trooper, when the handgun was found, White stated that if they seized his gun, he would just get another one because he lives on Stevens Avenue.

White was arrested at that time. He subsequently was released from custody pending further court hearings.

12. On September 13, 2019, the Franklin County Sheriff's Office narcotics unit received an anonymous tip concerning suspected drug activity at 121 Stevens Avenue, Columbus, Ohio. In this tip, the caller stated that this residence receives heavy drug traffic all day and night. The individuals believed to be receiving the drugs enter the residence using the back door. Additionally, the caller stated that a U-Haul and a box van (later identified as a box truck, a blue 1994 GMC box truck with Ohio license plate PKU4756, registered to Rich Forever Investments LLC) are also used at the residence as part of the drug activity.
13. Through November 4, 2019 through November 7, 2019, investigators conducted surveillance on 121 Stevens Avenue, Columbus, Ohio. During this surveillance, investigators observed constant activity at the residence. On every day of surveillance, investigators observed multiple individuals arriving at the residence and entering through the rear door and occasionally the front door. Once inside the residence, these individuals remained for short periods of time. Based upon the training and experience of investigators, investigators know this type of activity is consistent with individuals purchasing narcotics. Investigators also observed a box truck parked in the rear of the residence, matching the description of "box van" in the previous tip to FCSO. The front of this vehicle could easily be described as a van or a truck. This vehicle was actually a blue 1994 GMC box truck with Ohio license plate PKU4756, registered to Rich Forever Investments LLC. According to the Ohio Secretary of State, Rich Forever Investments LLC, is run by a Stephanie Bouphavong and Larry Williams Jr. Investigators did observe a lot of pedestrian activity around this box truck during the surveillance. Investigators

also observed individuals near the back door of this residence that were standing still near the truck and looking around the area, acting consistent with what investigators believed to be lookouts.

2019 (1)

14. On November 4, 2019, surveillance units observed a Honda Civic with California license plate 7PKZ470 arrive at 121 Stevens Avenue. This vehicle is registered to Stephanie S. Bouphavong, 1021 East Sarazen Ave, Fresno, California. A white female, matching the driver's license photograph of Stephanie Bouphavong, was observed exiting the Honda Civic and entering the front door of 121 Stevens Avenue. Further surveillance over the next few days observed Bouphavong at this residence on numerous instances.
15. Using various law enforcement databases, investigators found the most current address for Stephanie Bouphavong as 4594 Ava Point, Hilliard, Ohio. Additionally, law enforcement databases show Bouphavong's Honda Civic with California license plate 7PKZ470 in the area of both 121 Stevens Avenue, Columbus, Ohio and 4594 Ava Point, Hilliard, Ohio on numerous occasions.
16. On November 5, 2019, investigators observed Stephanie Bouphavong as she arrived at her residence located at 4594 Ava Point Hilliard, Ohio.
17. On September 30, 2019, investigators identified a residence located at 2849 Drew Heights Place, apartment #206, Reynoldsburg, Ohio 43068 that they believed was being used as a possible "stash house" for storage and distribution of narcotics that was being supplied by individuals associated with the Latin Kings street gang in Chicago, Illinois. While investigators established 24-hour surveillance on this residence from October 18, 2019 through November 6, 2019, investigators observed that no one actually resided at

this residence. Investigators did observe Lashawn White frequent this residence on numerous occasions while bringing boxes and bags into and out of this residence.

18. On November 14, 2019, investigators executed a State of Ohio search warrant on the residence located at 121 Stevens Avenue, Columbus, Ohio. Upon executing this search warrant, investigators located numerous individuals inside the residence including Larry Williams Jr., who is the co-owner of Rich Forever Investments LLC with Stephanie Bouphavong. Found and seized from inside this residence were 210.85 grams of propanamide (fentanyl) or a mixture containing fentanyl, 19.79 grams of meth, 115.43 grams of cocaine and 8.35 grams of heroin and five firearms. These drugs were packed for individual sale and it was apparent to investigators that this residence was being used as a selling point for numerous kinds of narcotics. Many on the individuals located inside this residence were identified as narcotics users, while it was apparent to investigators that two individuals were in charge of selling the narcotics, including Larry Williams Jr. and Jeffrey Mason Ford. These two individuals appeared to be the ones living in the two bedrooms of the residence. Both bedrooms contained numerous narcotics packaged for individual sale and marked with bright multi-colored round stickers which showed the price and type of drug for sale. For example, investigators found a small clear baggie which contained clear crystal substance, believed to be methamphetamines. On this baggie there was a green round sticker with "ice \$10" printed in ink on it. There were many other clear baggies with other types of suspected narcotics found throughout the residence and most of these had similar stickers and markings on them identifying the type of narcotics and price. The narcotics were stored in metal cash boxes. Some of these cash boxes were black metal with a gray tray. The tray is made to hold coins while the

cash would be placed under the tray, however at this residence investigators found narcotics and narcotic residue in the tray made to hold coins.

19. Following the execution of this search warrant, investigators obtained information from a Confidential Source (CS#1) who had direct knowledge of the activities at 121 Stevens Avenue. According to CS#1, Stephanie Bouphavong would come to 121 Stevens Avenue every day to retrieve the money that had been collected that day from the sale of the narcotics. CS#1 stated that Stephanie Bouphavong would then take the money to her house for storage. CS#1 stated that approximately \$2,000-\$3,000 profit would be made every day at 121 Williams Ave which <sup>STEVENS APD</sup> Stephanie Bouphavong would pick up. CS#1 also stated that Stephanie Bouphavong takes care of Larry William's children.
20. On November 19, 2019, at approximately 8:20pm, HSI Special Agent Raterman observed Stephanie Bouphavong's Honda Civic with California license plate 7PKZ470 and the box truck, a blue 1994 GMC box truck, believed to be the "box van" previously described in the tip to FCSO, with Ohio license plate PKU4756, registered to Rich Forever Investments LLC, both parked immediately in front of 4594 Ava Point, Hilliard, Ohio.
21. On November 21, 2019, at approximately 8:00am, investigators executed a State of Ohio search warrant at 4594 Ava Point, Hilliard, Ohio. Prior to executing this search warrant, investigators observed Stephanie Bouphavong's Honda sedan with California license plate 7PKZ470 parked immediately in front of 4594 Ava Point. Additionally, the blue box truck bearing Ohio license plate PKU4756, registered to Rich Forever Investments, also parked in front of the residence.
22. On November 21, 2019, at approximately 7:15am, investigators observed Stephanie Bouphavong exit 4594 Ava Point, Hilliard, Ohio and enter her Honda sedan with

California license plate 7PKZ470. Investigators also observed a female, approximately 16 years old, exit the residence and enter the passenger side of Bouphavong's vehicle. Investigators conducted surveillance on this vehicle as it departed the residence and eventually dropped the passenger off at South High School, 1160 Ann Street, Columbus, Ohio. After dropping off the passenger, Bouphavong drove her vehicle back to 4594 Ava Point, Hilliard, Ohio. Upon arriving at her residence, investigators approached her vehicle, identified themselves as law enforcement and explained to Bouphavong that they had a warrant to search her residence. Bouphavong provided her keys to her residence to investigators at that time. When investigators explained that they would like to ask Bouphavong some questions, she explained that she wouldn't speak with investigators without an attorney being present.

23. During the execution of this search warrant, some of the items found by investigators were as follows: a kilo press, 732.22 grams of propanamide, also known as fentanyl, 100.01 grams of cocaine , bundles of U.S. currency totaling \$5,519.00, a Raven Arms MP25 .25 caliber pistol SN: 1847463, a Ruger P94 9mm caliber pistol SN: 308-53444 and a stolen pink Ruger LCP. 380 caliber pistol SN: 371378008. These narcotics, the currency and the firearms were all located in the master bedroom closet. Stephanie Bouphavong's U.S. Passport (full name: Stephanie Sounary Bouphavong) was also found in this closet. Also found during the execution of this search warrant was a manual kilo press located on the floor of the master bedroom. Investigators know that kilo presses are often used by narcotics traffickers to package narcotics into tight bricks usually after "cutting" the narcotics with other "cutting" agents such as backing powder. This can, for

example, make one kilogram of a narcotic mixture into two kilograms of a less concentrated mixture of the narcotic.

24. During a search of Stephanie Bouphavong's Honda sedan with California license plate 7PKZ470, investigators found in the trunk two metal cash boxes that were some of the same type of cash boxes that were found to contain the narcotics at 121 Stevens Avenue on November 14, 2019. These cash boxes were black metal with a gray tray. The tray is made to hold coins while the cash would be placed under the tray. Additionally, investigators found the same type of round colorful stickers that were used on the baggies of narcotics at 121 Stevens Avenue, Columbus, Ohio as well as a digital scale and a security camera system.
25. On November 25, 2019, investigators provided a subpoena to the management of The Groves apartment complex, which is the management for 4594 Ava Point, Hilliard, Ohio. This subpoena requested all information related to the application and lease of 4594 Ava Point, Hilliard, Ohio. According to the paperwork provided by The Groves management, Stephanie Sounary Bouphavong rented this unit on May 13, 2019 and the lease was for 13 months. Bouphavong was paying \$1,241.00 per month for this apartment. Bouphavong provided her current employer for the application as AT&T, 1021 East Sarazen Avenue, Fresno, California. Stephanie Bouphavong was the only person on this lease.
26. On November 21, 2019, at approximately 8:42am, investigators executed a State of Ohio search warrant at 669 South Kellner Drive, Columbus, Ohio. It had been determined that this was the residence of Lashawn White after he sold cocaine to a Whitehall Police Department confidential informant. Lashawn White was the only person found to be

inside the residence during the execution of this search warrant. Some of the items found by investigators during this search were as follows: 485.1 grams of a mixture of propanamide (fentanyl) and Tramadol, 9.46 grams of fentanyl, 18.14 grams of cocaine, 26.65 grams of a mixture of heroin and fentanyl, 3 pistols, one sawed-off shotgun, and approximately \$20,363.00 in U.S. currency.

27. White was at the residence at the time of the search. He was detained during the execution of the search warrant. White was read his Miranda rights on scene and he chose to waive his rights and make a voluntary statement. In the post-Miranda interview of Lashawn White, investigators mentioned to White that investigators already knew that there were illegal drugs, guns, and money in the house. White didn't deny it. He was asked how much was in the house and where it was located. At this point, White asked for his attorney before speaking any further. Investigators attempted to contact White's attorney but was unable to reach him. The interview was discontinued at that point.
28. While the home was being searched, White's girlfriend, Antionette Horton, arrived at the residence. Investigators spoke to her in the front yard. She claimed that she didn't know anything about White having anything illegal in the home. When the room with the narcotics was brought up, she claimed that she never went in there and that was "his space."
29. On November 21, 2019, investigators executed a State of Ohio search warrant on at 2849 Drew Heights Place, apartment #206, Reynoldsburg, Ohio 43068. There was no one found to be inside this residence upon the execution of the search warrant. During this search warrant investigators located numerous empty wrappers which appeared to be wrappers for kilogram quantities of narcotics. On January 7, 2020, the Central Ohio

Regional Crime Lab reported that thirteen (13) of the fifteen (15) packages seized from 2849 Drew Heights Place, Unit #206, Reynoldsburg, Ohio were found to contain methamphetamine residue. Based upon the training and experience of investigators and the size and shape of the empty wrappers, investigators believe that this was in fact 15 kilograms of methamphetamine that had been distributed prior to the execution of the search warrant on the residence. Also found during the execution of this search warrant was .70 grams of a mixture containing fentanyl and inside the master bedroom was located four cellular telephones.

30. On February 6, 2020, investigators obtained a federal search warrant for the search of Lashawn White's LG cellular telephone, identified as Whitehall Police Department's item #19WHI-5235-PR, a LG cellular telephone, and marked as "Phone A" which was seized during the execution of a search warrant at 669 Kellner Ave, Columbus, Ohio on November 21, 2019. This phone was found inside a trash can in the master bedroom of the residence. In a subsequent examination of this cellular telephone, investigators observed numerous text messages consistent with discussions involving narcotics trafficking. Also found on this cellphone were numerous photographs of a white crystal substance believed to be methamphetamine. In one of these photographs 413 grams of this substance is on a digital scale and eight (8) more large baggies of this same white crystal substance are lined up behind the scale. It should be noted that the same type of scale observed in this photograph was seized from Lashawn White's residence, 669 South Kellner Road, Columbus, Ohio on November 21, 2019. Based upon the countertop, the sink, the outlet behind the suspected meth, and the corner wall, investigators believe this photograph was taken at the suspected stash house located at 2849 Drew Heights

Place, #206, Reynoldsburg, Ohio. This phone also contained a photograph of a large amount of U.S. currency on a wooden countertop. Based upon the countertop, investigators believe this picture was taken in the "prep" room at 669 S. Kellner Road, Columbus, Ohio.

31. On January 15, 2020, Lashawn White was charged by criminal complaint with Conspiracy to Possess with the Intent to Distribute 400 grams or more of fentanyl. White was arrested on January 17, 2020 and he was indicted for numerous drug offenses and a firearms offense on January 30, 2020.
32. On February 20, 2020, Lashawn White, Larry Williams, Jeffrey Mason Ford and Stephanie Bouphavong were indicted in a superseding indictment on numerous drug and firearms offenses. Ford and Bouphavong were subsequently arrested following this indictment.
33. Following these indictments and arrests, investigators conducted additional interviews of CS#1, who had previously provided information concerning Larry William's and Stephanie Bouphavong's activities at 121 Stevens Avenue. This source witnessed narcotics trafficking around the clock at 121 Stevens Avenue, and according to CS#1, Larry Williams was in charge of the house. Williams' underlings were Country (Richard James Rodgers) and Mason (Jeffrey Mason Ford) and they were responsible for serving customers on first and second shifts. Williams had lots of weapons in the house and if you were serving customers you always had one of his guns while doing so. Williams was known to drink constantly beginning first thing in the morning until he passed out at night. The source had observed people showing up at the house with gunshot wounds needing help or assistance and they would be cleaned up, have their clothes burned, given

some crack and sent on their way. The source also witnessed more than ten overdoses that resulted in the necessity to provide or administer Narcan which was present in the house. CS#1 had firsthand knowledge of Richard Rodgers activities in selling these narcotics. CS#1 positively identified a driver's license photograph of Richard James Rodgers as the individual CS#1 knew as Country, and the person working under Larry Williams in distributing narcotics at 121 Stevens Avenue.

34. Following these indictments and arrests, investigators conducted interviews of Confidential Source #2 (CS#2), who had direct knowledge and involvement with the activities at 121 Stevens Avenue. According to CS#2, there were three shifts that operated in selling narcotics at 121 Stevens Avenue. Larry William's would normally work the first shift and Jeffrey Mason Ford would work the third, while an individual named Richard Rodgers, known as Kountry or Country, worked second shift for Williams. CS#2 stated that Williams would cut and sell the drugs at 121 Stevens Avenue as customers arrived at the residence. CS#2 had firsthand knowledge of Richard Rodgers activities in selling these narcotics. CS#2 positively identified a driver's license photograph of Richard James Rodgers as the individual CS#2 knew as Richard Rodgers, aka Kountry/Country, and the person working second shift in distributing narcotics at 121 Stevens Avenue.
35. Following the previously referenced indictments and arrests, investigators conducted an interview of Confidential Source #3 (CS#3), who had direct knowledge and involvement with the activities at 121 Stevens Avenue. According to CS#3, there were three shifts that operated in selling narcotics at 121 Stevens Avenue. CS#3 stated that Jay Street (Larry Williams) ran this trap house and his partner was Country (Richard Rodgers) while

Jeffrey Ford also sold narcotics from this house. Ford was below Country in authority. Country left Stevens Avenue around 5-6 pm every day because he had to get back to his half-way house. He would come back around 7am in the morning to assist in selling the narcotics. Once Jay Street would pass out drunk in the evening, Ford would take over until County came back in the morning. According to CS#3, County, Ford and Jay Street sold fentanyl and cocaine the most. They sold approximately a couple of ounces of fentanyl per week. These individual did not breakdown and sell much tar heroin, only one ounce a week. According to CS#3, whoever was selling the drugs at the house always carried a firearm. This firearm, a Sig Sauer, was carried in a holster with a clip so people entering the house would see them carrying it. It would be passed on to whoever was working the next shift. CS#3 stated that there was a Sig, a Beretta, an AR-15, a Taurus handgun, and an AR-15 handgun inside 121 Stevens. They also had security cameras at the house. Ford and Country were in charge of selling the narcotics at 121 Stevens Ave when Jay Street was injured in a vehicle accident in late 2019. According to CS#3, there were approximately six overdoses inside the Stevens house. These were all brought back by using Narcan which was kept inside the house. CS#3 positively identified a driver's license photograph of Richard James Rodgers as the individual CS#3 knew as Country, and the person working with Larry Williams and Jeffrey Ford in distributing narcotics at 121 Stevens Avenue.

36. On January 10, 2019, investigators obtained a federal search warrant for the search of Jeffrey Ford's Samsung cellphone, which was found in his residence on November 14, 2019. This cellphone had been seized by the Franklin County Sheriff's Office (FCSO) pursuant to the execution of a State of Ohio search warrant on his residence located at

121 Stevens Avenue, Columbus, Ohio. This phone was found in the west bedroom within 121 Stevens Avenue. Following a forensic examination, investigators observed numerous photographs and “selfies” of Jeffery Ford located on this cellphone. These photographs included selfies of Ford holding and posing with firearms including the firearms that were seized during the execution of the search warrant at 121 Stevens Avenue.

Additional photographs that were found on Ford’s phone include pictures of some of the narcotics that were eventually seized from 121 Stevens Avenue. These narcotics pictures include images of numerous orange and pink pills and pictures of the cash boxes found in both bedrooms which are holding cash and narcotics. There are also dozens of text messages consistent with discussions involving narcotics trafficking located on his phone. Additionally, located on this cellphone were numerous text messages between Ford and Stephanie Bouphavong’s cellular telephone, identified in Ford’s phone as “Steff”, as well as text conversations with Larry Williams, referred to as “J” in this phone. Also located on Ford’s cellphone were numerous telephone calls and text messages to “Kuntry” at 614-696-3278.

37. On February 6, 2020, investigators obtained a federal search warrant for the search of Larry Williams Jr.’s cellular telephone identified as a LG cellular telephone which was seized by the Franklin County Sheriff’s Office during the execution of a search warrant at 121 Stevens Avenue, Columbus, Ohio on November 14, 2019. This cellphone was found in the bedroom facing Stevens Ave. which is the bedroom believed to have been used by Larry Williams Jr. The results of the forensic examination on this device showed the names associated with this phone were Larry Williams and Jay and Jay Street. Investigators did observe two calls between this phone and Lashawn White at 614-946-

2988 identified as "Barber". There were also numerous calls between this phone and the previously identified phone number of Richard Rodgers aka Kuntry at 614-696-3279.

Investigators also found numerous photographs of Larry William on this phone as well a video "selfie" of Williams and Richard Rodgers.

### CONCLUSION

38. Based on the foregoing facts, your Affiant believes that there is probable cause to believe that Richard James Rodgers (a.k.a. Country/Kountry/Kuntry) has violated 21 U.S.C. §§ 841 and 846, conspiracy to possess with intent to distribute 400 grams or more of a mixture or substance containing fentanyl. Accordingly, your Affiant requests the issuance of a criminal complaint and arrest warrant for Richard James Rodgers (a.k.a. Country/Kountry/Kuntry).

  
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Special Agent Ryan Marvich  
Homeland Security Investigations

Subscribed and sworn to before me this 25<sup>th</sup> day of September, 2020.

  
  
Elizabeth Preston-Deavers  
United States Magistrate Judge